

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Sherri Norris)	Case No. 19-00071
)	
Debtor(s))	CHAPTER 13
)	
)	Judge Jacqueline P. Cox

AMENDED NOTICE OF MOTION

TO:

Tom Vaughn, Trustee (via electronic notice)

United States Trustee (via electronic notice)

Sherri Norris, Po Box 6612, Broadview, IL 60155

See attached list of all creditors

PLEASE TAKE NOTICE that on 2/4/2019 at 10:00 a.m. or soon thereafter I shall be heard, I shall appear before the Honorable Judge Jacqueline P. Cox at 219 S. Dearborn St., Courtroom 680, Chicago, IL, and request that the attached motion be granted, at which time you may appear if so desired.

/s/Xiaoming Wu
Ledford, Wu & Borges, LLC.
105 W. Madison St., 23rd Flr.
Chicago, IL 60602
312-853-0200

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MOTION TO EXTEND AUTOMATIC STAY

The debtor(s), by and through counsel, and in support of their Motion to Extend the Automatic Stay pursuant to 11 U.S.C. § 362(c)(3)(B), states to the court as follows:

1. The court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. The debtor(s) filed a petition for relief and a plan under Chapter 13 of the Bankruptcy Code on January 2, 2019.
 4. The debtor(s) had a prior bankruptcy case dismissed within the preceding year:

Case number 15 B 30393

Date of Dismissal: October 15, 2018
5. The debtor(s) has had a substantial change in financial and/or personal affairs since the dismissal of the previous case that will effectively rebut the presumption of this case not being filed in good faith pursuant to 11 U.S.C. § 362(c)(3)(C) by clear and convincing evidence. (An affidavit is being submitted later once signed and notarized.)
6. During the previous case, the debtor made nearly 3 years' worth of payments, but also experienced various problems with properties she rents out and tenants not paying the rent.

7. The debtor now has improved income with more tenants paying and also a contribution from a friend that should make all the expenses of property ownership more affordable.

8. Copies of Schedules I and J from the previous case and the current case are attached hereto, marked Exhibit B.

WHEREFORE, the debtor(s) requests that the court enter an order extending the Automatic Stay as to all creditors for the duration of this Chapter 13 bankruptcy, and grant the debtor such other relief as just and proper.

Respectfully submitted,

/s/ Xiaoming Wu
Ledford, Wu & Borges, LLC.
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